

"Kevin Sump"<kevins@sciremc.c
To: "'richard.karney@ee.doe.gov'"

Subject: "Energy Star" rating for water heaters
05/14/2003 02:22
PM

Dear Mr. Karney:

I am writing in reference to the Department of Energy's interest in establishing an "Energy Star" rating for water heaters. I am commenting on behalf of South Central Indiana Rural Electric Cooperative. Our member-owned electric cooperative serves more than 32,000 members in a seven county area of central Indiana.

Water heating accounts for a significant portion of our electric load. We have had very aggressive water heating programs available for our members for many years. Our program provides members the opportunity to purchase highly efficient electric water heaters at very competitive prices. We only offer high efficiency units with an efficiency rating of .92 to .94. A large percentage of our members do not have access to natural gas so their only option other than electric water heating is an LP gas water heater. If the member does not heat their home with LP gas adding an LP water heater would be very difficult and extremely expensive. Also, many elderly people have concerns about having LP gas in their homes. A recent survey completed by a professional research firm indicated that 71% of our residential customers have electric water heating. Since 1993 we have completed five surveys and the saturation of electric water heating has ranged from a low of 68% to a high of 81%.

We certainly support the "Energy Star" concept and have always had in place programs to assist our members in purchasing high efficiency appliances. In addition to water heating, we have programs for geothermal heating systems, thermal storage heating, and electric heat pumps. While electric heat pumps for space heating have been in existence for many years and are very reliable and efficient, heat pump technology for water heating is still being developed and does not assure the reliability we feel is necessary for us to promote their use.

We would encourage you to include electric resistance water heating in any type of "Energy Star" program that recognizes their reliability and energy efficiency. The addition of electric water heating in energy efficiency program would help give the program the significance and relevance that it deserves. This is especially true when you consider the large percentage of rural residents who have electric water heaters in their homes, in many cases because it is their only viable option.

We appreciate the opportunity to provide comments on this important issue and wish you the best if you proceed in developing an "Energy Star" program for water heating.

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